

## Exhibit 10

Defendants' Initial Responses to José Claros's First Set of  
Discovery Requests To All Defendants

(Excerpts)

5. Please state José Claros's agreed-upon rate of compensation and the method by which he was compensated (e.g. check or cash.) If he was compensated by more than one method, please describe fully (e.g., how much was in check and how much in cash). If the plaintiff's agreed-upon pay rate or method of payment changed at any time, state when the change occurred, the persons who authorized the change, and all reasons the change occurred.

Answer:

The agreed upon rate was \$22/hour. He was paid with company checks. There was no formal pay stubs or W-2. He worked as independent contractor. Sweet Home Improvements kept asking Jose Claros for SSN and address. He would not give it, despite numerous requests to do so. This is the reason why 1099 could not be prepared and records incomplete.

10. Please identify all persons who supervised or inspected José Claros's work at any time during his tenure at Sweet Home, or who had the authority to do so. Describe the nature of the nature of their supervisory or inspection authority. As part of your answer, if any of the foregoing changed at any time during José Claros's tenure, please answer separately as to each time period, describing when the change took place; who authorized the change; and for what reasons the change was authorized.

Answer:

Mr. Koo is responsible for all job site work.

11. Please identify any individuals supervised by José Claros, and describe the nature of his supervisory responsibilities. As part of your answer, if any of the foregoing changed at any time during José Claros's tenure, please answer separately as to each time period, describing when the change took place; who authorized the change; and for what reasons the change was authorized.

Answer:

Mr. Koo is responsible for all assignment and supervision of work on the project.

20. If you relied on any outside source (whether a person, a document, or anything else) to determine or ensure that your payroll practices complied with federal, state, or local law, please identify all such sources, and describe fully the nature of the advice or guidance you received from that source. If the source is written, produce the document in full. As part of your answer, specifically identify all occasions on which you consulted each source, and identify and produce any documents that you provided to that source. As part of your answer, if you maintained or made available any labor/employment law posters, or other similar postings, provide a copy of all such posters or postings, and describe in detail where and when they were posted, and by whom.

Answer:

All payroll recording keeping and processing was done by Mrs. Koo.

I declare, under penalty of perjury of the laws of the United States, that my answers to Plaintiff José Claros's First Set of Interrogatories are true and correct. 28 U.S.C. § 1746(2).

Name: Savathome Improvements president's  
Signature: [Signature] Myung Kwan Koo.

Executed on (date): 6/10/16

[Signature]  
Myung Kwan Koo

[Signature]  
Mi Ae Koo